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**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

SHAHAN STEFAN SAHIB,

Plaintiff,

v.

JJS TRANSPORTATION & DISTRIBUTION CO. and
HARPREET S. MAHO,

Defendants.

SUMMONS

Index No.: 516039/2021

Date Filed: 6/30/2021

Plaintiff(s) designate(s)
KINGS COUNTY as the
place of trial.

The basis of venue is:
Location of accident
Brooklyn, New York

TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiff's attorneys an answer to the complaint in this action within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

DATED: New York, New York
June 30, 2021

Yours, etc.,

THE BARNES FIRM, P.C.

By Joe A. Vazquez
Joe A. Vazquez, Esq.
Attorneys for Plaintiff
420 Lexington Avenue - Suite 2140
New York, NY 10170
(800) 800-0000 x539

TO: JJS TRANSPORTATION & DISTRIBUTION CO.
24 Locust Street
Manhasset, NY 11030

HARPREET S. MAHO
167-27 145th Avenue
Jamaica, NY 11434

6. That at all times herein relevant, defendant, JJS TRANSPORTATION & DISTRIBUTION CO., committed a tortious act without the State of New York causing injury to person or property within the State of New York.

7. That at all times herein relevant, defendant, JJS TRANSPORTATION & DISTRIBUTION CO., owns, uses or possesses any real property situated with the State of New York.

8. That by virtue of the allegations above, defendant, JJS TRANSPORTATION & DISTRIBUTION CO., is subject to the laws of the State of New York pursuant to CPLR 302.

9. At all times herein relevant defendant HARPREET S. MAHO has been a resident of the County of Nassau and State of New York.

10. On or about December 10, 2018 plaintiff SHAHAN STEFAN SAHIB was the owner of a certain 2013 Dodge bearing a Canadian license plate number AP81222.

11. On or about December 10, 2018, defendant JJS TRANSPORTATION & DISTRIBUTION CO. was the owner of a certain 2016 Mack truck bearing New York State license plate number 47493PC.

12. On or about December 10, 2018, at approximately 5:45 p.m. plaintiff SHAHAN STEFAN SAHIB, operated the vehicle described in paragraph 10 above.

13. On or about December 10, 2018, at approximately 5:45 p.m. defendant HARPREET S. MAHO, operated the vehicle described in Paragraph 11 above with the full consent of the owner, defendant JJS TRANSPORTATION & DISTRIBUTION CO.

14. On or about December 10, 2018, at approximately 5:45 p.m. defendant HARPREET S. MAHO, operated the vehicle described in Paragraph 11 above with the full knowledge of the owner, defendant JJS TRANSPORTATION & DISTRIBUTION CO.

15. On or about December 10, 2018, at approximately 5:45 p.m. defendant HARPREET S. MAHO, operated the vehicle described in Paragraph 11 above with the full permission of the owner, defendant JJS TRANSPORTATION & DISTRIBUTION CO.

16. Under New York Law, defendant JJS TRANSPORTATION & DISTRIBUTION CO., as owner of the motor vehicle, is responsible and liable for the negligent and/or reckless operation of its motor vehicle.

17. On or about December 10, 2018, at approximately 5:45 p.m., plaintiff SHAHAN STEFAN SAHIB, operated the vehicle described in Paragraph 10 above traveling eastbound on Pennsylvania Avenue in the City of Brooklyn, County of Kings and State of New York.

18. On or about December 10, 2018, at approximately 5:45 p.m., defendant HARPREET S. MAHO, operated the vehicle described in Paragraph 11 above traveling eastbound on Pennsylvania Avenue in the City of Brooklyn, County of Kings and State of New York.

19. On or about December 10, 2018, at approximately 5:45 p.m., the vehicle operated by defendant HARPREET S. MAHO, struck the vehicle being operated by plaintiff SHAHAN STEFAN SAHIB at the intersection of Atlantic Avenue and Pennsylvania Avenue in the City of Brooklyn, County of Kings and State of New York.

20. As a result of the above referenced incident, Plaintiff SHAHAN STEFAN SAHIB was injured.

21. The incident described in Paragraph 19 above occurred as a result of the negligence and/or recklessness of defendants JJS TRANSPORTATION & DISTRIBUTION CO. and HARPREET S. MAHO, without any negligence attributable in any measure to plaintiff SHAHAN STEFAN SAHIB.

22. Plaintiff SHAHAN STEFAN SAHIB, has sustained a serious injury, as defined in subsection (d) of section five thousand one hundred two of the New York State Insurance Law.

23. Plaintiff SHAHAN STEFAN SAHIB, has sustained economic loss greater than basic economic loss, as defined in subsection (a) of section five thousand one hundred two of the New York State Insurance Law.

24. The limitations on liability set forth in CPLR Article 16 do not apply herein; one or more of the exemptions set forth in CPLR Section 1602 applies.

25. As a result of the negligence and/or recklessness of defendant driver HARPREET S. MAHO, for which defendant owner JJS TRANSPORTATION & DISTRIBUTION CO., is liable and responsible, as alleged above, plaintiff SHAHAN STEFAN SAHIB, was injured and has suffered damages in an amount which exceeds the monetary jurisdictional limits of all lower New York State Courts.

WHEREFORE, Plaintiff SHAHAN STEFAN SAHIB, demands judgment against defendants, JJS TRANSPORTATION & DISTRIBUTION CO. and HARPREET S. MAHO, jointly and severally, in an amount which exceeds the monetary jurisdictional limits of all lower New York State Courts and plaintiff SHAHAN STEFAN SAHIB, demands such

other, further and different relief as the Court may deem just and proper, together with the costs and disbursements of this action.

DATED: New York, New York
June 30, 2021

Yours, etc.,

THE BARNES FIRM, P.C.

By: Joe A. Vazquez
Joe A. Vazquez, Esq.
Attorneys for Plaintiff
420 Lexington Avenue - Suite 2140
New York, NY 10170
(800) 800-0000 x539

Index No: 516039/2021

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

SHAHAN STEFAN SAHIB,

Plaintiff(s),

-against-

JJS TRANSPORTATION & DISTRIBUTION CO. and
HARPREET S. MAHO,

Defendant(s),

SUMMONS AND COMPLAINT

THE BARNES FIRM, P.C.
Attorneys for Plaintiff
Office & Post Office Address, Telephone
420 Lexington Avenue, Suite 2140
New York, New York 10170
(800) 800-0000

Dated: New York, New York
June 30, 2021

Service of a copy of the within is hereby admitted.

PLEASE TAKE NOTICE:

NOTICE OF ENTRY

that the within is a (certified) true copy of an Order
duly entered in the office of the clerk of the within named court on

NOTICE OF SETTLEMENT

that an order
presented for settlement to the HON.
within named Court, at
on at
Dated:

of which the within is a true copy will be
one of the judges of the

M.

Yours, etc.

THE BARNES FIRM, P.C.
Attorneys for Plaintiff
420 Lexington Avenue, Suite 2140
New York, New York 10170
(800) 800-0000

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
SHAHAN STEFAN SAHIB,

Plaintiff/Petitioner,

- against -

Index No.516039/2021

JJS TRANSPORTATION & DISTRIBUTION CO. and
HARPREET S. MAHO,

Defendant/Respondent.
-----X

**NOTICE OF ELECTRONIC FILING
(Mandatory Case)
(Uniform Rule § 202.5-bb)**

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case

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• **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

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Dated: June 30, 2021

Joe A. Vazquez
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To: ALL DEFENDANTS

6/6/18